

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 04-50 Erie
)	
JOHN JOSEPH PRICE, JR.)	

DEFENDANT JOHN JOSEPH PRICE, JR.'S MOTION TO CONTINUE TRIAL

AND NOW, comes the defendant, John Joseph Price, Jr., by his attorney, Thomas W. Patton, Assistant Federal Public Defender, and respectfully moves the Court to continue his trial. In support thereof Counsel states:

1. Mr. Price has been charged in a seven-count indictment with manufacturing methamphetamine, attempting to manufacture methamphetamine, and possessing pseudoephedrine, sodium hypophosphite, hydriodic acid, iodine, and acetone with intent to manufacture methamphetamine in violation of Title 21 U.S.C. § 841(a) and 841(b)(1)(C), 846, and 841(c) (1) respectively.

2. On Thursday, May 4, 2006, this Court ruled on Mr. Price's motion to suppress.

3. Based upon the Court's ruling on the motion to suppress, the parties are negotiating a plea agreement. Additional time is needed to finalize the plea agreement.

4. Accordingly, Mr. Price respectfully requests that this Court continue the trial in this matter to the August trial term.

WHEREFORE, defendant, John Joseph Price, Jr., respectfully requests that this Honorable Court continue the trial in this case to the August trial term.

Respectfully submitted,

/s/ Thomas W. Patton

Thomas W. Patton

Assistant Federal Public Defender

PA I.D. No. 88653